

HOGAN & HARTSON LLP

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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TOTALMAR NAVIGATION CORP.,	:	
	:	
Plaintiff,	:	Index No. 08-cv-1659 (HB)
-against-	:	ECF Case
	:	
ATN INDUSTRIES INC.,	:	
	:	
Defendant.	:	
	:	
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DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT

Defendant/Counterclaim-Plaintiff, ATN Industries Inc. (“ATN”) files this
Unopposed Motion for Leave to Exceed Page Limit.

On July 21, 2008, ATN will file a consolidated reply in support of its Motion to
Vacate or Reduce *Ex Parte* Order of Maritime Attachment, Motion for Counter-Security
Pursuant to Supplemental Rule E(7), and Motion to Stay Proceedings and to Compel Arbitration
(collectively, the “Motions”).

Under Judge Baer’s Individual Practices, reply memoranda are limited to ten
pages. Rule 4(C). ATN seeks leave to file its reply of approximately four pages in excess of that
limit.

It is necessary to exceed the ten-page limit because the reply is a consolidated
reply in support of three motions. ATN cannot adequately address Plaintiff’s response to the

three motions in a consolidated reply of ten pages. ATN therefore requests leave to file its reply memorandum of approximately fourteen pages.

WHEREFORE, ATN requests that this Court grant its Unopposed Motion for Leave to Exceed Page Limit.

Dated: July 17, 2008

Respectfully submitted,

By _____/s/_____
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CERTIFICATE OF CONFERENCE

I certify that Samuel E. Wolfe, an Associate with my law firm conferred with Rahul Wanchoo, Esq., counsel for Plaintiff, regarding the relief sought in this motion. Mr. Wanchoo stated that Plaintiff does not oppose this motion.

_____/s/_____
George F. Hritz

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	:	
Plaintiff,	:	Index No. 08-cv-1659 (HB)
	:	ECF Case
-against-	:	
	:	
ATN INDUSTRIES INC.,	:	
	:	
Defendant.	:	
-----	X	

AFFIRMATION OF SERVICE

George F. Hritz affirms under penalty of perjury:

I am an attorney admitted to practice in the State of New York and am a partner with the law firm of Hogan & Hartson LLP, attorneys for defendant in the above-captioned matter.

I certify that on July 17, 2008, I electronically filed Defendant's Unopposed Motion for Leave to Exceed Page Limit with the Clerk of the Court using CM/ECF, and it is being served this day on all counsel authorized to receive Notices of Electronic Filing generated by CM/ECF, including counsel below:

Rahul Wanchoo, Esq.
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Empire State Building
350 Fifth Avenue, 59th Floor
New York, New York 10118
Attorneys for plaintiff Totalmar Navigation Corp.

Dated: July 17, 2008

_____/s/_____
George F. Hritz